



## State of New Jersey

Department of Environmental Protection

Jon S. Corzine  
Governor

Mark N. Mauriello  
Acting Commissioner

Bureau of Case Management  
401 East State Street  
P.O. Box 028  
Trenton, NJ 08625-0028  
Phone #: 609-633-1455  
Fax #: 609-633-1439

February 9, 2009

Patricia Simmons Pierre  
United States Environmental Protection Agency  
Region 2  
290 Broadway  
New York NY 10007-1866

Re: Remedial Investigation Workplan  
L E Carpenter  
170 North Main St.  
Wharton, Morris County  
SRP PI# 003017  
Activity Number Reference: RPC060001

Dear Ms. Pierre:

The New Jersey Department of Environmental Protection (Department) has completed review of the Remedial Investigation Workplan dated August 22, 2008, submitted pursuant to CERCLA and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (Tech Rules).

The Department's comments on the submittal are provided below.

### **General Comments**

1. **Remaining Sources Sampling Plan, page 6-1** The sampling plan calls for the use of a Tar-Specific Green Optical Screening Tool for the detection of free or residual phase DEHP and xylene. All requirements specified at 7:26E 2-1(b) must be followed, especially, "Field screening methods shall not be used to verify contaminant identity or clean zones. However, where 10 or more samples are required for initial characterization sampling at an area of concern, field screening

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methods listed in (b)3 and 4 below may be used to document that up to 50 percent of sampling points within the area of concern are not contaminated.”

2. **The Tar-specific Green Optical Screening Tool and the Oil-N-Soil Method.** These appear to be specific for the detection and screening of a separate phase contaminant. The use of the technology is acceptable, provided that the appropriate number of confirmatory lab samples is collected to verify the results of the field screening. The NAPL screening tools do not provide any indication of the actual contaminant levels in soil and groundwater. The screening tools merely provided a qualitative indication of whether or not NAPL is present. Also, no lower detection limit is specified for the technology. The final delineation of contamination in soil at the additional source areas must be completed using traditional soil collection methods and the results compared to the Site Remediation Standards. (Refer to <http://www.state.nj.us/dep/srp/regs/rs/>).

### **Deficiencies**

3. **7:26E-4.4(h)3vii- Failure to properly evaluate any surface water body potentially impacted by contaminated groundwater.** LE Carpenter applied the incorrect New Jersey Surface Water Quality Criteria FW-2 in its assessment of ground water impacts to the Rockaway River. The correct classification is FW-2-NT(C1). This classification is a non-degradation standard, and several surface water sampling locations indicated exceedances by site related contaminants.

The DEP notes that much higher surface water detection limits are employed after the 4<sup>th</sup> Quarter 2006 (November 2006). Detection limits were raised by a factor of 5X-10X. This practice is questionable since the higher detection limits mask exceedances of the applicable SWQC. Accordingly, the RP must re-institute the previous detection limits in future surface water sampling efforts.

4. **7:26-6.3(a)- Failure to contain contaminants as a first priority, or to prevent contaminant exposure to receptors and to prevent further movement of contaminants through any pathway.** Contaminant levels in MW-30S significantly exceed the GWQS and are higher than those before source removal (excavation). These contaminants are discharging to the ditch that borders the site and empties into the Rockaway River.

Upon the completion of the proposed product delineation activities in the wetlands, the DEP requires that product be removed, destroyed in place or controlled so no product or dissolved contamination discharges to the adjacent surface waters. Additionally, the DEP requires complete delineation of the dissolved ground water contamination, horizontally and vertically, to the applicable GWQS.



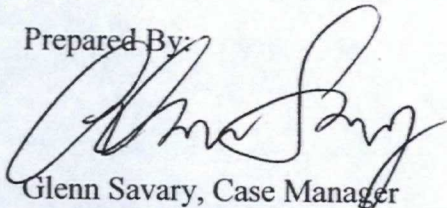
### Corrective Actions

Please submit a response addressing the above deficiencies and comments within 30 calendar days after receipt of this letter.

Please incorporate these comments into the letter that the USEPA will be sending to LE Carpenter.

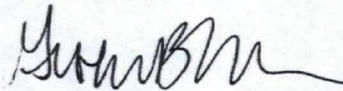
If you require copies of Department Guidance Documents or applications, many of these are available on the internet <http://www.state.nj.us/dep/srp>. If you have any questions regarding this matter contact Glenn Savary Case Manager, at (609) 633-0835, or at [glenn.savary@dep.state.nj.us](mailto:glenn.savary@dep.state.nj.us), prior to the date indicated.

Prepared By:



Glenn Savary, Case Manager  
Bureau of Case Management

Reviewed By:



Gwen Zervas, P.E., Section Chief  
Bureau of Case Management

cc: George Blyskun, BGWPA  
John Prendergast, BEERA  
Health Officer, Wharton  
Clerk, Wharton